



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

**JUN 23 2015**

**CERTIFIED MAIL 7009 1680 0000 7662 5869**  
**RETURN RECEIPT REQUESTED**

Mr. David Treis  
Vice President Manufacturing  
Arandell-Schmidt  
N82 W13118 Leon Road  
Menomonee Falls, Wisconsin 53051-3328

Re: Notice of Violation  
RCRA Compliance Evaluation Inspection  
Arandell-Schmidt  
EPA I.D. No.: WID 006 087 225

Dear Mr. Treis:

On August 13, 2014, a representative of the U.S. Environmental Protection Agency inspected the Arandell-Schmidt facility located in Menomonee Falls, Wisconsin. As a large quantity generator of hazardous waste, Arandell-Schmidt is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Arandell-Schmidt's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Arandell-Schmidt, EPA's review of records pertaining to Arandell-Schmidt, and the inspector's observations, EPA has determined that Arandell-Schmidt has unlawfully stored hazardous waste without a license or interim status as a result of Arandell-Schmidt's failure to comply with certain conditions for a license exemption under Wisconsin Admin. Code. §§ 662.034(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA finds that Arandell-Schmidt is not in compliance with the following conditions for a storage license exemption, and is in violation of the following requirements:

1. Satellite Accumulation- Closed Containers



In order to avoid the need for a hazardous waste storage license, a large quantity generator must always keep a container holding hazardous waste closed during storage, except when it is necessary to add or remove waste. See, Wisconsin Admin. Code § 662.034(3)(a)1 [40 CFR § 262.34]. This is also a requirement of owners and operators of hazardous waste storage facilities that store hazardous waste, under Wisconsin Admin. Code § 665.0173 [40 CFR § 265.173].

At the time of the inspection, Arandell-Schmidt maintained, in the Centrifuge Room, one opened 55-gallon drum labeled as "Hazardous Waste, Printer Ink" when hazardous waste was not being removed or added.

Arandell-Schmidt, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage license exemption, and violated the hazardous waste generator requirement.

## 2. Satellite Accumulation- In Excess

In order to avoid the need for a hazardous waste storage license, a large quantity generator who accumulates hazardous waste in excess of the amounts at or near any point of generation must, with respect to that amount of excess waste, comply within 3 days. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating. See, Wisconsin Admin. Code § 662.034(3)(b)[40 CFR § 262.34(c)(2)].

At the time of the inspection, Arandell-Schmidt maintained three 55-gallon drums storing hazardous waste in excess of hazardous waste amounts, at or near the point of generation, beyond the permitted three days without providing the date the excess amount began accumulating.

Arandell-Schmidt, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage license exemption, and violated hazardous waste generator requirements. However, at the time inspection, the three drums were moved to a 90-day hazardous waste accumulation area and marked with accumulation start dates and DOT pre-transportation information. Therefore, no further action is required for this requirement.

## 3. Satellite Accumulation – Marking

In order to avoid the need for a hazardous waste storage license, a large quantity generator must mark containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers at or near the point of generation. See, Wisconsin Admin. Code § 662.034(3)(a)(2)[40 CFR § 262.34(c)(1)(ii)].

At the time of the inspection, one 10-gallon container storing solvent contaminated wipes was not labeled as "Excluded Solvent-Contaminated Wipes." Arandell-Schmidt, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage license exemption, and violated the hazardous waste generator requirement.

#### 4. 90-Day Container Accumulation- Weekly Inspections

In order to avoid the need for a hazardous waste storage license, a large quantity generator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. See, Wisconsin Admin. Code § 662.034(1)(a)1 [40 CFR § 262.34(a)(1)(i)]. This is also a requirement of owners and operators of hazardous waste storage facilities that store hazardous waste, under Wisconsin Admin. Code § 665.0174 [40 CFR § 265.174].

At the time of the inspection, Arandell-Schmidt did not provide documentation to demonstrate the weekly inspection of hazardous waste container storage areas. On September 5, 2014, a copy of a container inspection log was provided to the inspector. The weekly inspection log indicated weekly inspections were conducted on August 14, 2014, August 21, 2014, August 28, 2014, and September 4, 2014. However, the weekly inspection log did not indicate the weekly inspection of hazardous waste container storage areas prior to the August 13, 2014 inspection.

Arandell-Schmidt, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage license exemption, and violated the hazardous waste generator requirement.

#### 5. Training

In order to avoid the need for a hazardous waste storage license, a large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. See, Wisconsin Admin. Code § 662.034(1)(d) and 665.0016(1)[40 CFR § 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. See, Wisconsin Admin. Code § 662.034(1)(d) and 665.0016(2)-(3)[40 CFR § 262.34(a)(4) and 265.16(b)-(c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;

- 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and
- 4) Records that document that the training or job experience described above has been given to and completed by facility personnel.
- 5) Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least 3 years from the date the employee last worked at the facility.

See, Wisconsin Admin. Code § 662.034(1)(d) and 665.0016(1) and (5), [40 CFR § 262.34(a)(4) and 265.16(d)(1-4)].

At the time of the inspection, Arandell-Schmidt was unable to provide a written description of the type and amount of introductory and continuing training for 16 employees assigned duties related to hazardous waste management for calendar years 2012, 2013, and 2014. On August 29, 2014, Arandell-Schmidt provided the inspector an updated job description for one employee, and on September 5, 2014 some training records were provided for the inspector to review. However training records for the following employees were not provided: (1) Joyce Feaster; (2) Diana Kuemmerlein; (3) Ed Huber; (4) Joe Damsk; (5) Rocky Kaye; and (6) Matt Clough.

Arandell-Schmidt, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage license exemption, and violated the hazardous waste training requirement.

#### 6. Contingency Plan and Emergency Procedures

In order to avoid the need for a hazardous waste storage license, a large quantity generator must ensure that a copy of the contingency plan and all revisions to the plan be submitted to all local police departments, fire departments, hospitals and state and local emergency response teams that may be called upon to provide emergency services. See, Wisconsin Admin. Code § 662.034(1)(d) and 665.0052(3)[40 CFR § 262.34(a)(4) and 265.52(b)].

On August 29, 2014, Arandell-Schmidt provided the inspector an updated emergency plan that was amended sometime in August 2014. However, no documentation was provided to demonstrate if the updated 2014 emergency plan was made available to local emergency providers. Arandell-Schmidt, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage license exemption, and violated the contingency plan and emergency procedures requirement.

Other areas of noncompliance at Arandell-Schmidt include:

#### 7. Hazardous Waste Manifest

Under Wisconsin Admin. Code § 662.040(1)[40 CFR § 262.40(a)], a generator must keep a copy of each manifest signed in accordance for 3 years or until the generator receives a signed copy from the designated facility which received the waste. This signed copy shall be retained as a record for at least 3 years from the date the waste was accepted by the initial transporter.

At the time of the inspection, the following manifests were not available for review: 001687492GBF; 001687491GBF; and 001687493GBF. Arandell-Schmidt, therefore, violated the hazardous waste manifest requirement. However on August 20, 2014, the three manifests were provided to the inspector. Thus, no further action is necessary to comply with this requirement.

#### 8. Land Disposal Restriction

Under Wisconsin Admin. Code § 668.07(1)(h)[40 CFR § 268.7(a)(8)], a generator must retain on-site a copy of all notices, certifications, waste analysis data and other documentation produced pursuant to this section for at least 3 years from the date that the waste that is the subject of the documentation was last sent to on-site or off-site treatment, storage or disposal. The 3 year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the department.

The following land disposal restriction documents were not available for review at the time of the inspection: 001687492GBF; 001687491GBF; and 001687493GBF. Arandell-Schmidt, therefore, violated the land disposal restriction waste requirement. However, on August 14, 2014, land disposal restriction documents were provided to the inspector. Thus, no further action is necessary to comply with this requirement.

#### 9. Hazardous Waste Determination Requirement

Under Wisconsin Admin. Code § 662.011[40 CFR § 262.11], a large quantity generator who generates a solid waste must determine if a solid waste is a hazardous waste.

At the time of the inspection, Arandell-Schmidt could not provide documentation to demonstrate if a hazardous waste determination was conducted for a 55-gallon drum labeled as "Soap and Oil Waste." Arandell-Schmidt, therefore, violated the hazardous waste determination requirement.

#### 10. Hazardous Waste Determinations Record Keeping

Under Wisconsin Admin. Code § 662.040(3)[40 CFR § 262.40(c)], a large quantity generator shall keep records of any test results, waste analyses or other determinations made for at least 3 years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal.

At the time of the inspection, Arandell-Schmidt did not provide test results, waste analyses or other determinations made for at least 3 years from the date that the waste was last sent

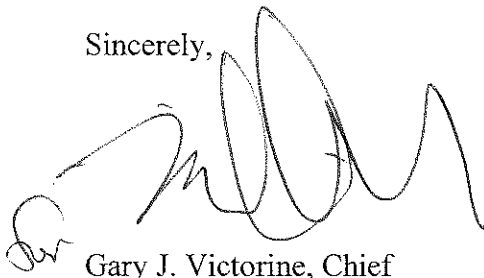
to on-site or off-site treatment, storage or disposal. Arandell-Schmidt, therefore, violated the hazardous waste recordkeeping and reporting requirement.

On failing to comply with the condition for a license exemption referenced in items 1 through 6 above, Arandell-Schmidt became an operator of a hazardous waste storage facility, and was required to apply for and to obtain a hazardous waste storage license. Arandell-Schmidt's failure to apply for and to obtain a hazardous waste storage license violated the licensing requirements of Wisconsin Admin. Code. §§ 670.001(3); 670.010(1) and (4) [40 C.F.R. §§ 270.1, 270.10, and 270.13].

At this time EPA is not requiring Arandell-Schmidt to apply for a storage license so long as it immediately establishes compliance with the conditions for exemption as outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified period. Although this is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Cindy Dabner, United States Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Cindy Dabner, of my staff, at [dabner.cindy@epa.gov](mailto:dabner.cindy@epa.gov) or 312-886-5890.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gary J. Victorine', is written over a horizontal line.

Gary J. Victorine, Chief  
RCRA Branch

Enclosures

cc: Michael Ellenbecker, WDNR ([michael.ellenbecker@wisconsin.gov](mailto:michael.ellenbecker@wisconsin.gov))

Dennis Mack, WDNR ([dennis.mack@wisconsin.gov](mailto:dennis.mack@wisconsin.gov))

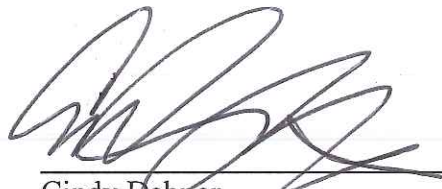


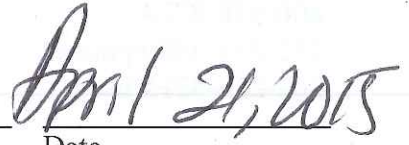
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5, LCD, RCRA BRANCH, LR8J  
77 WEST JACKSON BLVD  
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**SITE NAME:** ARANDELL-SCHMIDT  
**EPA ID NUMBER:** WID 006 087 225  
**ADDRESS:** N82 W13118 Leon Road, Menominee Falls, Wisconsin 53051  
**DATE OF INSPECTION:** August 13, 2014  
**EPA INSPECTOR:** Cindy Dabner  
Environmental Scientist

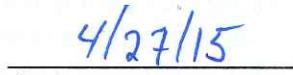
**PREPARED BY:**

  
Cindy Dabner  
Compliance Section 2

  
Date

**ACCEPTED BY:**

  
Julie Morris, Chief,  
Compliance Section 2

  
Date

**Purpose of the Inspection**

This inspection was an evaluation of Arandell-Schmidt's compliance with hazardous waste regulations found in the Wisconsin Administrative Code (WAC) and in Title 40 of the Code of Federal Regulations (40 CFR), Parts 260 through 279. Inspector Cindy Dabner of the U.S. Environmental Protection Agency Region 5 conducted the inspection. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation (CEI). The site notified as a large quantity generator (LQG).

**Participants****U.S. Environmental Protection Agency-**

Cindy Dabner, U.S. EPA Inspector U.S. EPA Region 5

[dabner.cindy@epa.gov](mailto:dabner.cindy@epa.gov)

Work Phone: 312-886-5890

**Representative of Arandell-Schmidt**

David C. Treis, Vice President Manufacturing

Menominee Falls, Wisconsin 53051-3328

[dct@arandell.com](mailto:dct@arandell.com)

800-558-8724

262-255-4400/phone

262-255-8215/fax

**Introduction**

On August 13, 2014, Inspector Dabner arrived to the site at approximately 11:10 am. Inspector Cindy Dabner presented her federal identification and explained the purpose of the visit was to conduct a hazardous waste inspection.

During the opening conference, Inspector Dabner inquired about the required safety measures to conduct during the inspection tour. According to the facility representative, the typical standard safety equipment was all that was required. The standard safety equipment included steel-toed shoes and hard hat. No special safety measures were mentioned or identified to Inspector Dabner.

Inspector Dabner discussed during the opening conference, confidential business information (CBI) and the use of a camera during the inspection. The Arandell representative did not make any CBI claims on: (1) the information provided to the inspector; or (2) photographs taken during the inspection.

**Site Description**

Arandell is a mail order catalog printing company that was initially established in 1992 in the Milwaukee, Wisconsin Area. The company has since expanded to become one of the largest lithographic sheet fed printer in southeast Wisconsin. The 250,000 square foot facility is now located in Menominee Falls, Wisconsin. The company employs 600 employees and operates 24 hours a day seven days a week.

**Waste Generation**

The main hazardous waste generated at the facility includes waste graphic ink, clean up solvent from rags, and parts washer solvent.

### **EPA Hazardous Waste Codes**

D001 and D018

### **Site Tour**

The site inspection began in the Explosion Room. At this location, the inspector observed emergency spill equipment in 55-gallon containers as well as a fire extinguisher. This room also serves as a 90-Day Hazardous Waste Accumulation Area. At the time of the inspection, no hazardous waste was observed in the Explosion Room.

The inspection moved to the Centrifuge Room. At this location, the inspector observed a satellite accumulation area (SAA) with three 55-gallon drums storing hazardous waste. The three drums were observed in excess of 55-gallons, without accumulation start dates, and beyond the three days permitted to move the drums to a less than 90-day hazardous waste storage area. The facility representative arranged for the drums to be moved to a 90-Day Hazardous Waste Accumulation Area. At this location, the drums were provided hazardous markings and accumulation start dates.

Also in the Centrifuge Room, the inspector observed one 55-gallon drum marked as "Hazardous Waste Printer Ink." The 55-gallon drum was observed opened, but not in excess of 55-gallons.

The inspection continued to the Maintenance Room. In the Maintenance Room, two 10 gallon containers were observed containing used rags. The two 10-gallon containers were not marked as "Excluded Solvent-Contaminated Wipes."

Also in the Maintenance Room, the inspector observed, in a satellite accumulation area, one 55-gallon drum marked as hazardous waste. The 55-gallon drum was not observed in excess of 55 gallons.

Further along in the Maintenance Room, the inspector observed one 55-gallon drum marked as "Soap and Oil Waste."

Finally, in the Maintenance Room, the inspector observed two 55-gallon drums marked as hazardous waste (Waste Petroleum Distillates) with an accumulation start date of 8-13-14.

### **Record Review**

A records review was conducted during and after the inspection. The inspector requested to review hazardous waste determination documents, hazardous waste manifest, land disposal restriction (LDR) forms, universal waste documents, contingency plans, daily tank inspection records, weekly inspection logs, biennial reports, and personnel training records for the past three years.

The following items were observed as the result of the record review:

**Generator Status Notification:**

The facility reported as large quantity generator (LQG)

**Hazardous Waste Manifest:**

Manifest records were reviewed for calendar years 2012, 2013, and 2014. The following 2012 manifests were not available for review at the time of inspection: 001687492GBF; 001687491GBF; and 001687493GBF.

**Hazardous Waste Determination Documents:**

No concerns were noted in the review of the hazardous waste determination documents.

**Land Disposal Restriction Documents:**

At the time of the inspection, the following land disposal restriction documents were not available for review: 001687492GBF; 001687491GBF; and 001687493GBF.

**Weekly Container Inspection:**

At the time of inspection, no documentation was made available to demonstrate weekly inspection of 90-Day Hazardous Waste Accumulation Areas.

**Personnel Training Records:**

Training records provided did not demonstrate annual training was conducted for personnel whose job position duties were relevant to the management of hazardous waste for calendar years 2012, 2013, and 2014 for the following employees:

- Alan Kochnowicz
- Bill Bley
- Jeff Shimel
- Wes Goetzke
- Mark Burkhelz
- Bruce Turner
- John Kuhmuench
- Jay Kollmansburger
- Jim Misarek
- Davis Tries
- Joyce Feaster
- Diana Kuemmerlein
- Ed Huber
- Joe Damsk
- Rocky Kaye
- Matt Clough

Also, the following training documents were not available for each of the personnel identified above:

1. Job title and the employee name for each position related to hazardous waste management
2. Job description for each of the above job titles
3. Description of the amount and type of introductory and continuing training that will be given to each employee
4. Records that required training has been given to each employee.

Additionally, 2012 hazardous waste manifests showed Mr. Wes Goetzke's signature as the generator for Arandell-Schmidt, but hazardous waste training records were not available to demonstrate hazardous waste training was conducted in 2011, 2012, or 2013 for Mr. Goetzke.

**Contingency Plan and Emergency Procedures:**

The emergency plan was amended in 2014. No documentation was provided to demonstrate the updated plan was made available to local emergency providers.

**Preparedness and Prevention:**

No concerns were noted in regard to preparedness and prevention requirements.

**Used Oil:**

Rebuttable presumption requirements were not provided.

**Annual Reporting:**

No concerns were noted in regard to annual reporting.

**Universal Waste:**

Universal waste was not observed at the time of inspection.

**Closing Conference**

A closing conference was conducted with Mr. Treis. The Inspector summarized the notes taken during the inspection. Inspector Dabner explained how the observation notes would be reviewed and used to generate an inspection report. Inspector Dabner briefly discussed EPA's procedures for following up with the facility representative after conducting an inspection.

**Post-Inspection**

Supplementary information was not following the inspection.

**Attachments**

- A. Arandell-Schmidt Photographs
- B. Arandell-Schmidt Checklist
- C. Arandell-Schmidt Documentation Log

# ATTACHMENT A

Arandell and Schmidt Photographs

WID 006 087 225

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #1

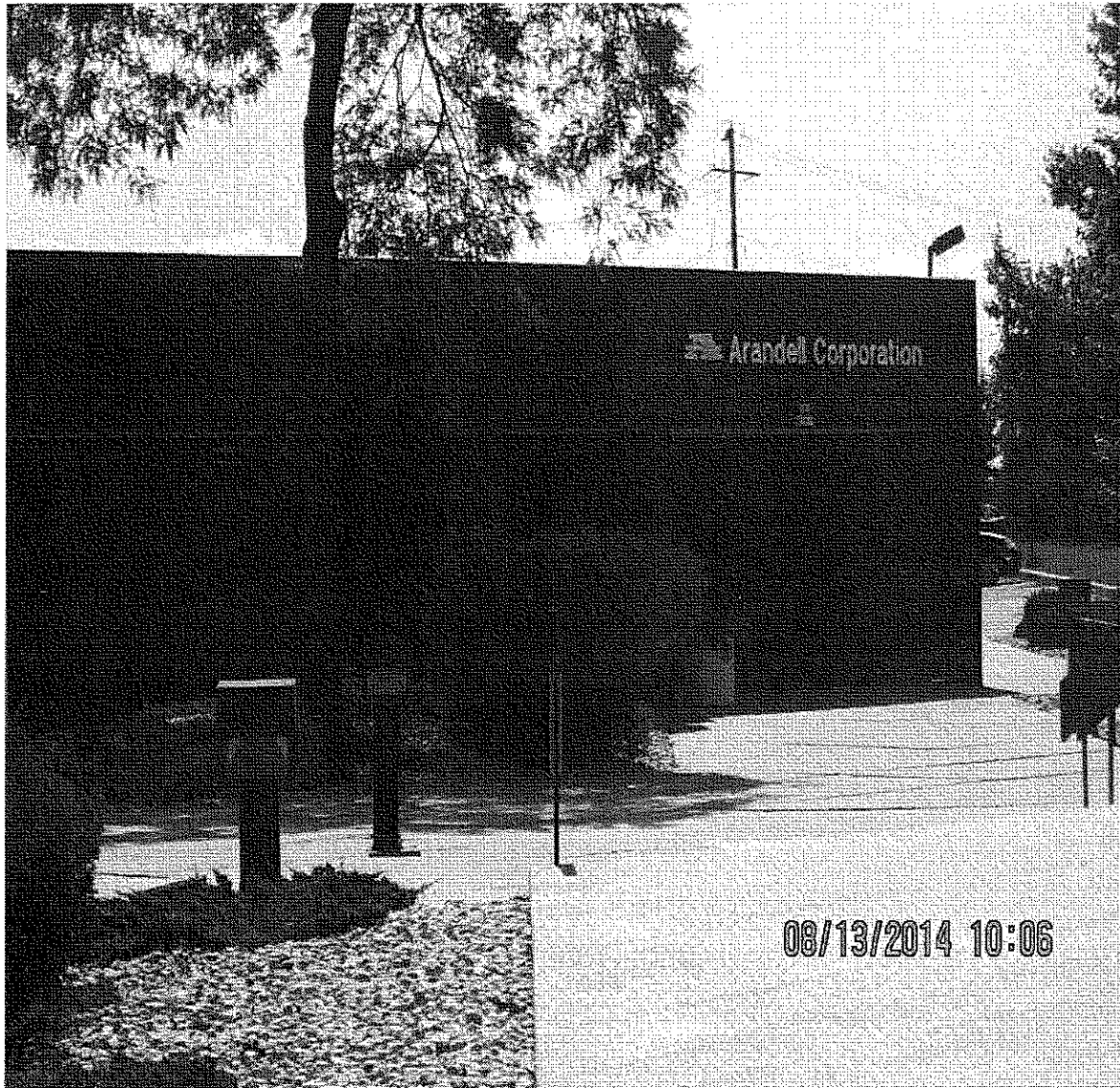
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051

Description: Photograph of the facility sign

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #2  
Name of Photographer: Cindy Dabner  
Date/Time of Photograph: August 13, 2014  
Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051  
Description: Photograph of the facility sign

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #3

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051

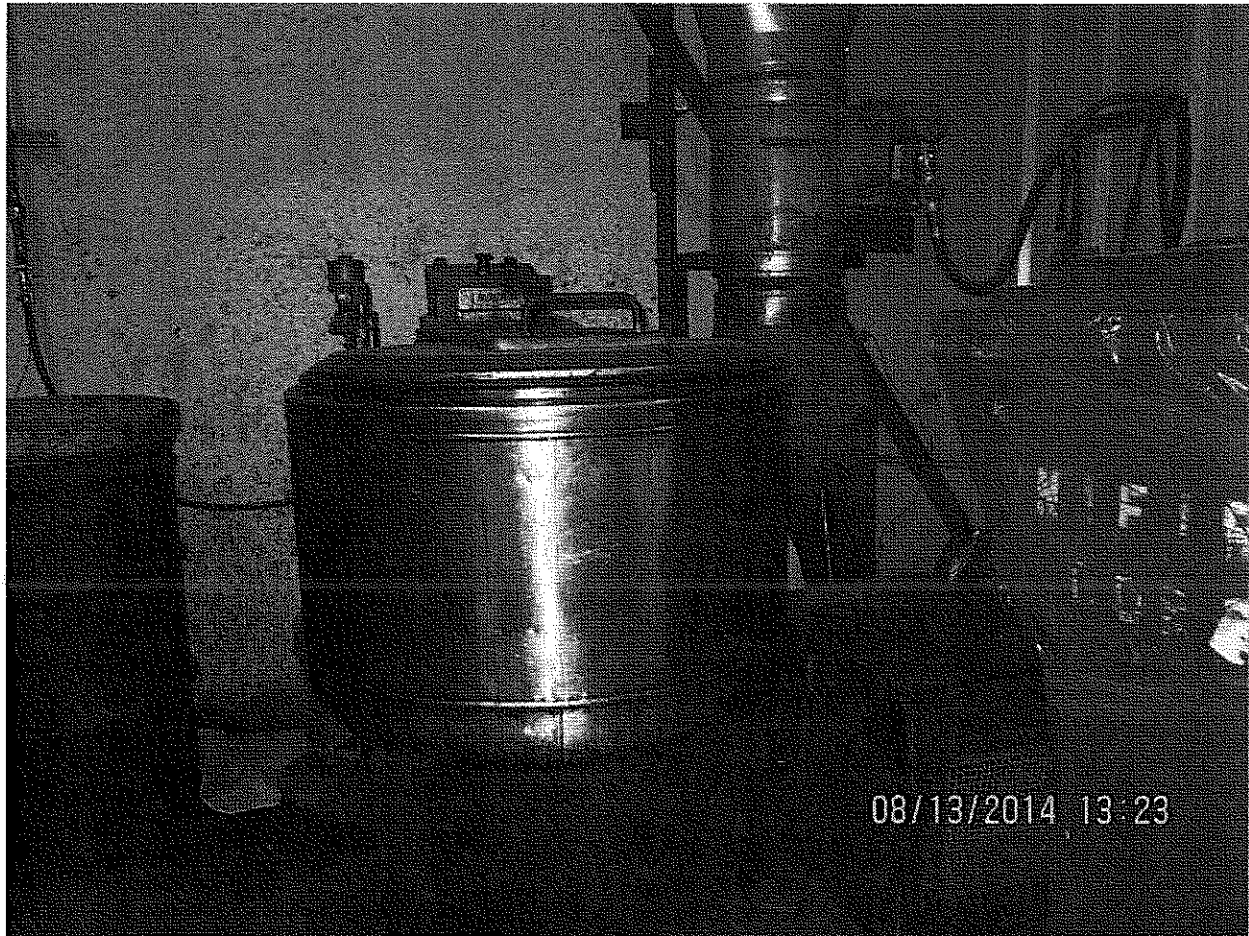
Description: Emergency spill equipment located in the Explosion Room

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #4  
Name of Photographer: Cindy Dabner  
Date/Time of Photograph: August 13, 2014  
Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051  
Description: Emergency response equipment located in the Explosion Room

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #5

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051

Description: Centrifuge equipment located in Centrifuge Room

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #6

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051

Description: A closer picture of the centrifuge equipment

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #7

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051

Description: Picture of the Satellite Accumulation Area Sign

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #8  
Name of Photographer: Cindy Dabner  
Date/Time of Photograph: August 13, 2014  
Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051  
Description: Three 55-gallon drums labeled as hazardous waste

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #9

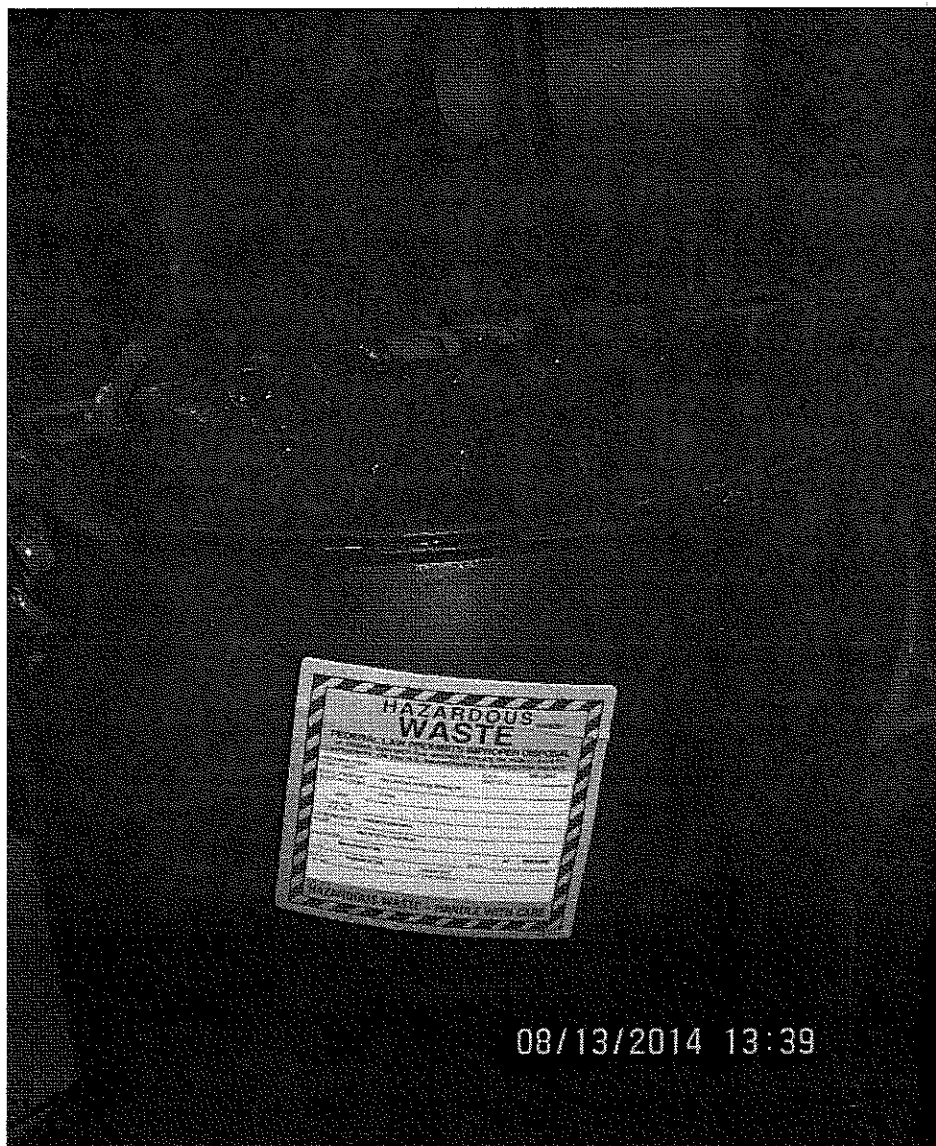
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051

Description: One 55-gallon drum containing hazardous waste printing ink not closed

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #10

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051

Description: Closer photograph of the 55-gallon drum containing hazardous waste printing ink

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #11

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051

Description: 55-gallon drum with hazardous waste that was observed opened and not full

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #12

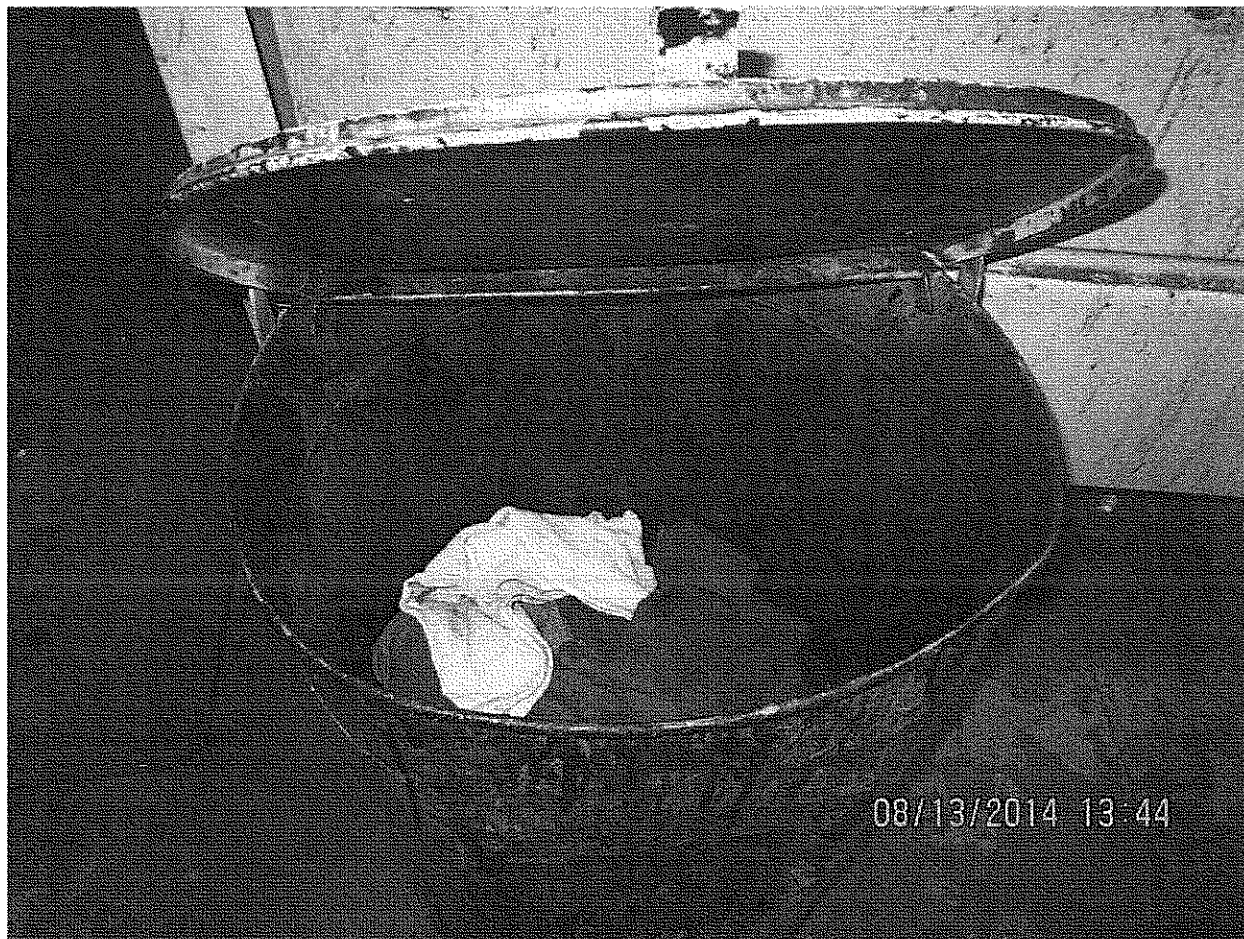
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051

Description: 10-gallon container storing used rags

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #13

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051

Description: 10-gallon container contents observed as used rags

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #14

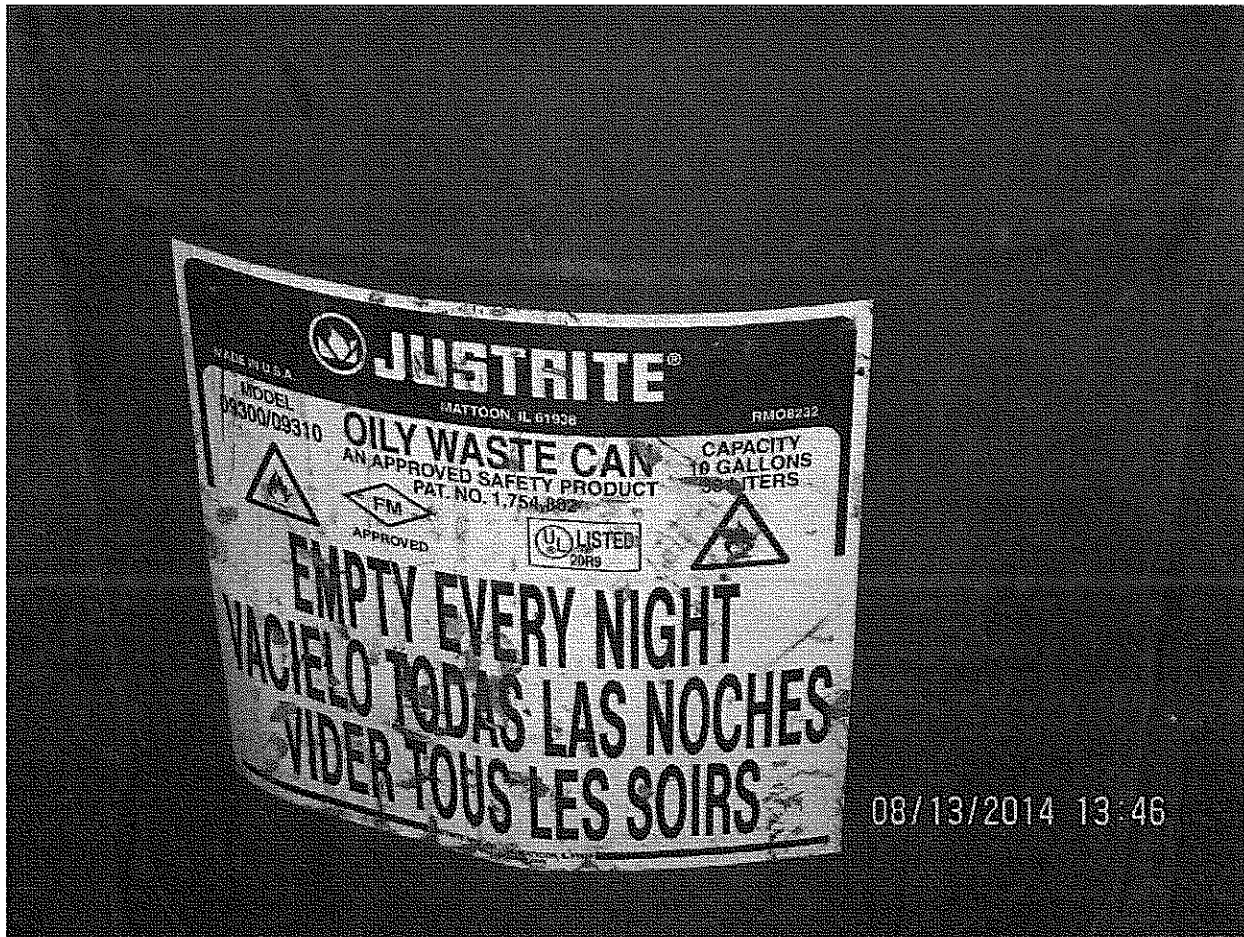
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051

Description: 10-gallon containing used rags

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #15  
Name of Photographer: Cindy Dabner  
Date/Time of Photograph: August 13, 2014  
Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051  
Description: 10-gallon container marked as "Oily Waste Can"

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #16

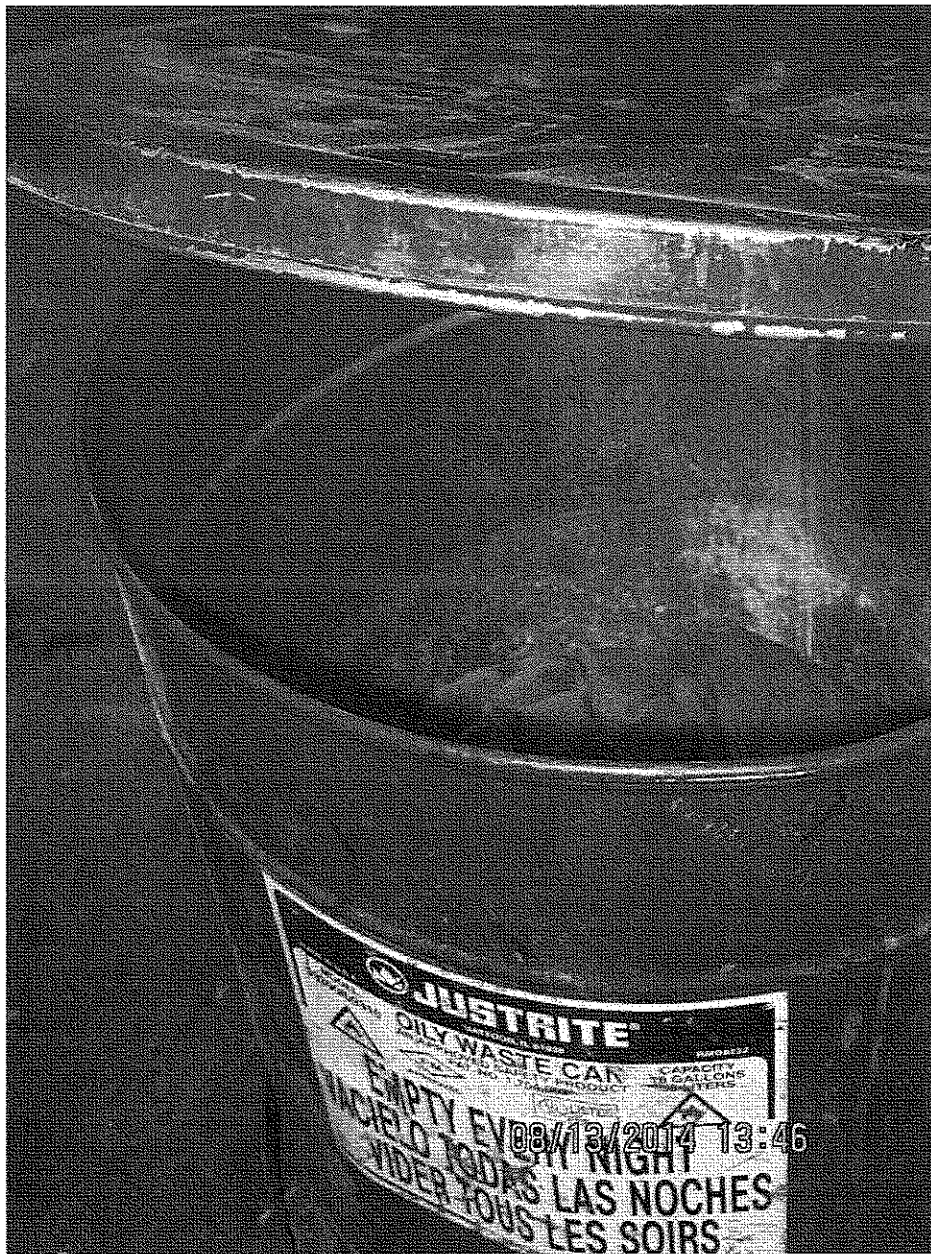
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051

Description: Container with used oily rags

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #17

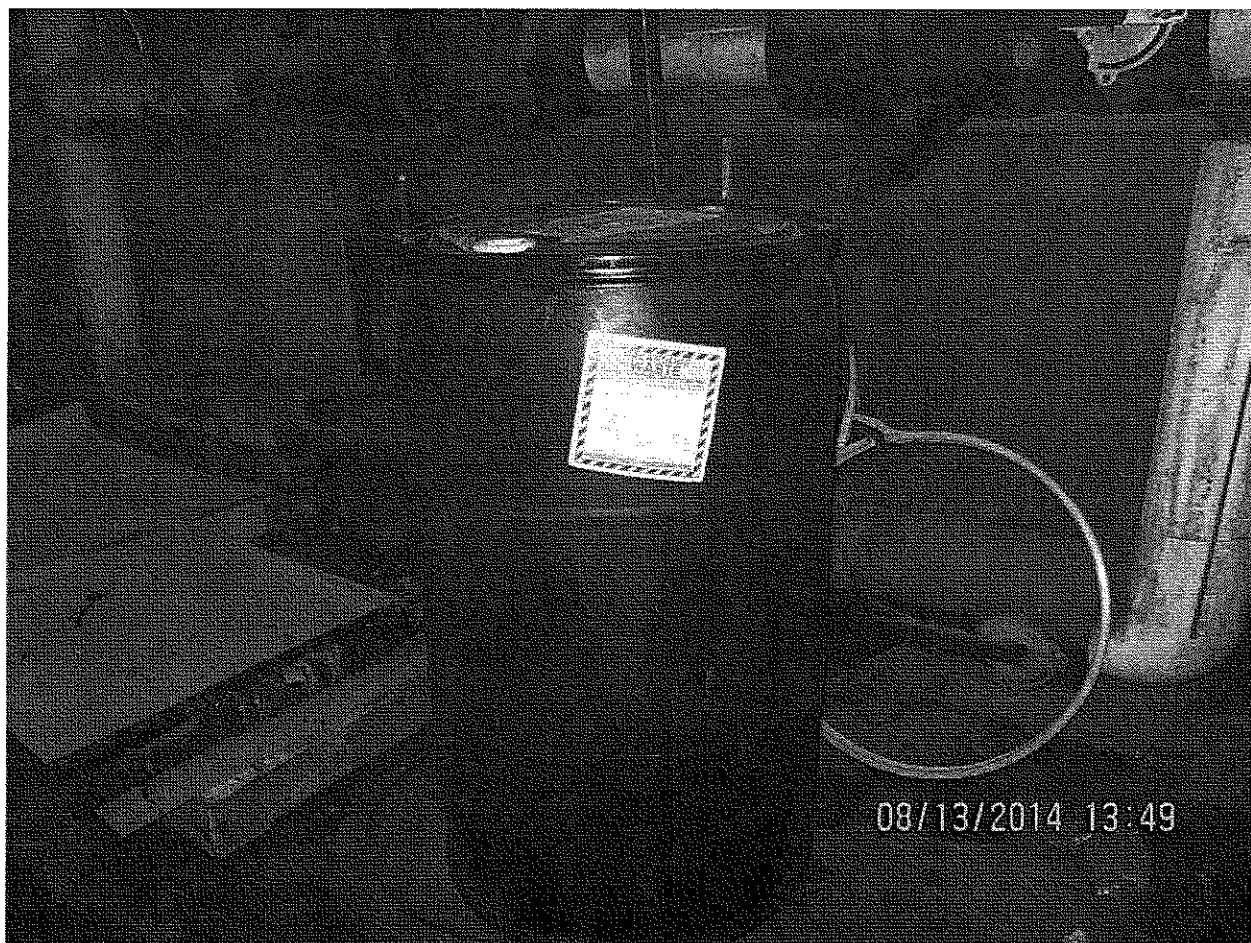
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051

Description: 10-gallon container marked as oily waste

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #18

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051

Description: 55-gallon drum marked as hazardous waste

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014

**HAZARDOUS WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL  
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY  
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

ACCUMULATION START DATE \_\_\_\_\_ E.P.A. WASTE NO. D001, D018

D.O.T. PROPER SHIPPING NAME RQ UN1210, WASTE Printing Ink

AND S, P011

U.N. OR N.A. NO. \_\_\_\_\_

GENERATOR'S NAME Arandell Corporation

ADDRESS N82 W13118 Leon Road

CITY Menomonee Falls STATE WI 53052-0418

E.P.A. ID NO. WID006087225 MANIFEST TRACKING NO. 08/13/2014 13:49

**HAZARDOUS WASTE - HANDLE WITH CARE**

Photograph: #19  
Name of Photographer: Cindy Dabner  
Date/Time of Photograph: August 13, 2014  
Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051  
Description: 55-gallon drum label

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #20

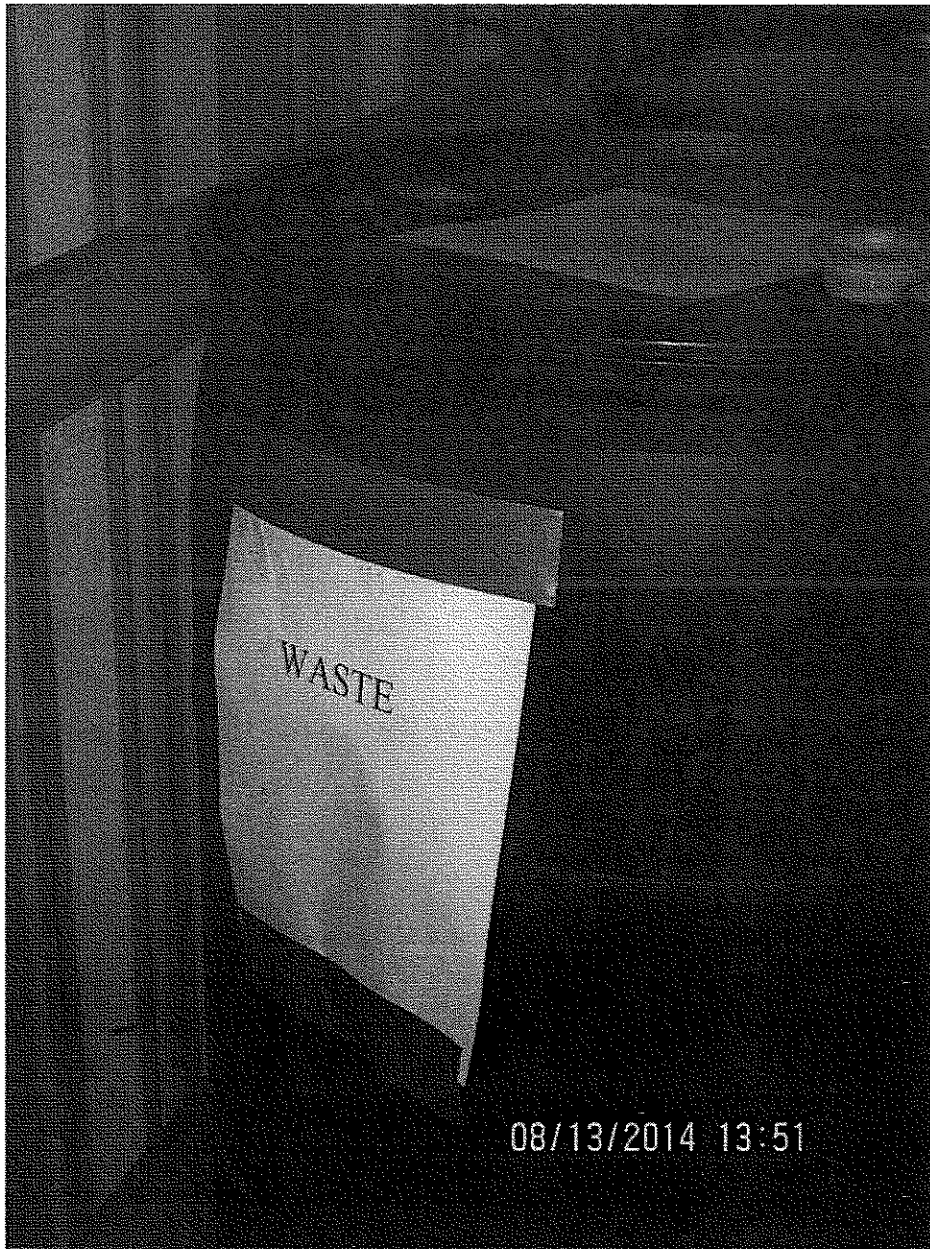
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051

Description: Drum marked as "Soap & Oil Waste"

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #21

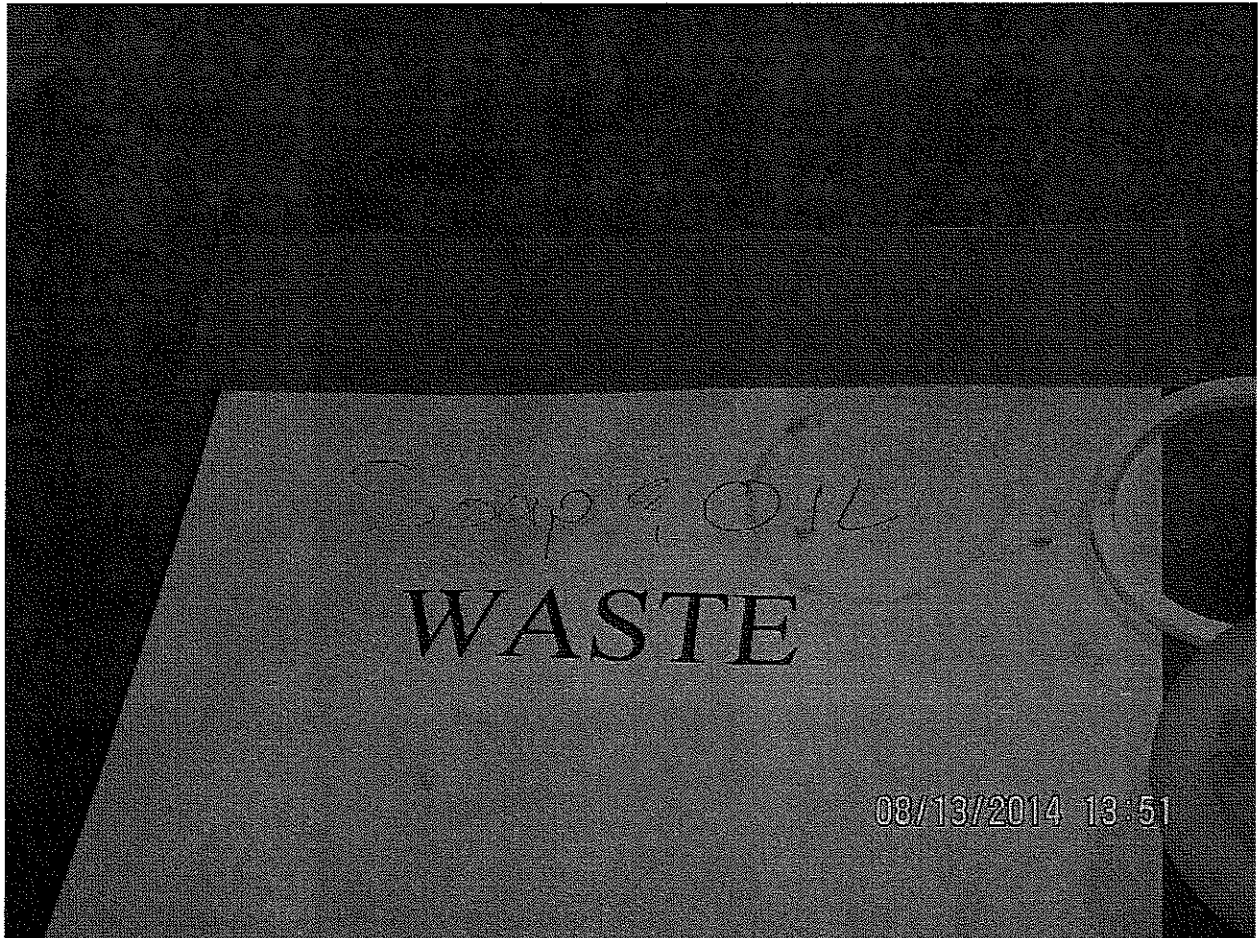
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051

Description: 55-gallon drum marked as "Soap & Oil Waste"

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #22

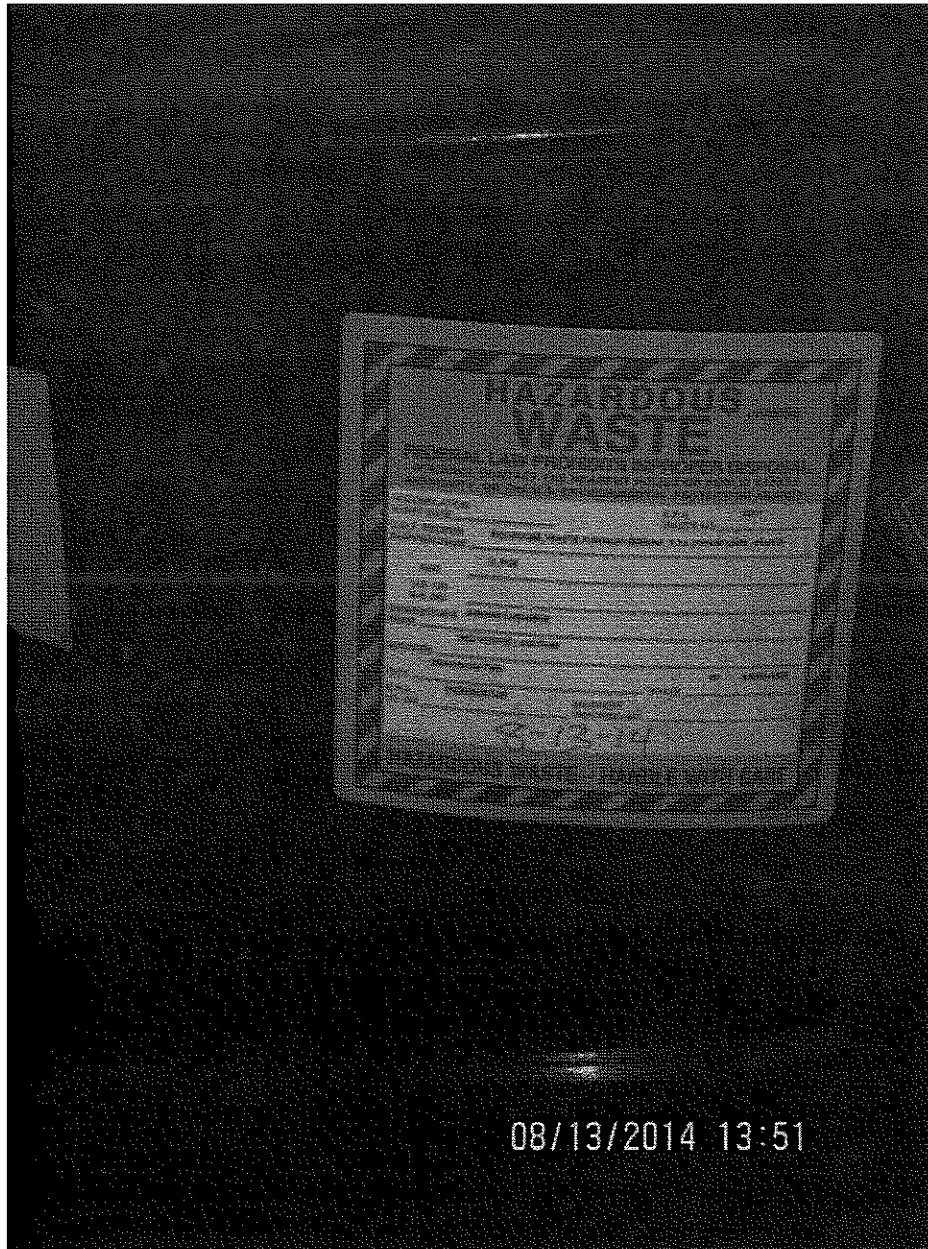
Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menomonee Falls, WI 53051

Description: Soap & Oil Waste Label

Attachment A  
Photographs for Arandell-Schmidt  
WID 006 087 225  
N82 W13118 Leon Road,  
Menomonee Falls, WI 53051  
August 13, 2014



Photograph: #23

Name of Photographer: Cindy Dabner

Date/Time of Photograph: August 13, 2014

Site Location: N82 W13118 Leon Road, Menominee Falls, WI 53051

Description: 55-gallon drum marked as hazardous waste (petroleum distillates)

The image shows two hazardous waste labels. The label on the left is a rectangular 'HAZARDOUS WASTE' label with a striped border. It contains a form with fields for 'WASTE NAME', 'WASTE ID', 'WASTE CODE', 'WASTE QUANTITY', 'WASTE DENSITY', 'WASTE SPECIFIC GRAVITY', 'WASTE VISCOSITY', 'WASTE SOLIDITY', 'WASTE pH', 'WASTE TEMPERATURE', 'WASTE COLOR', 'WASTE ODOUR', 'WASTE TOXICITY', 'WASTE CORROSIVITY', 'WASTE REACTIVITY', 'WASTE FLAMMABILITY', 'WASTE EXPLOSION HAZARD', 'WASTE ENVIRONMENTAL HAZARD', 'WASTE TREATMENT', 'WASTE DISPOSAL', 'WASTE STORAGE', 'WASTE HANDLING', 'WASTE TRANSPORT', 'WASTE EMERGENCY RESPONSE', 'WASTE INCIDENTS', 'WASTE COMPLIANCE', 'WASTE AUDIT', 'WASTE REVIEW', 'WASTE SIGNATURE', 'WASTE DATE', 'WASTE TIME', 'WASTE LOCATION', 'WASTE CONTAINER', 'WASTE VOLUME', 'WASTE WEIGHT', 'WASTE DENSITY', 'WASTE SPECIFIC GRAVITY', 'WASTE VISCOSITY', 'WASTE SOLIDITY', 'WASTE pH', 'WASTE TEMPERATURE', 'WASTE COLOR', 'WASTE ODOUR', 'WASTE TOXICITY', 'WASTE CORROSIVITY', 'WASTE REACTIVITY', 'WASTE FLAMMABILITY', 'WASTE EXPLOSION HAZARD', 'WASTE ENVIRONMENTAL HAZARD', 'WASTE TREATMENT', 'WASTE DISPOSAL', 'WASTE STORAGE', 'WASTE HANDLING', 'WASTE TRANSPORT', 'WASTE EMERGENCY RESPONSE', 'WASTE INCIDENTS', 'WASTE COMPLIANCE', 'WASTE AUDIT', 'WASTE REVIEW', 'WASTE SIGNATURE', 'WASTE DATE', 'WASTE TIME', 'WASTE LOCATION', 'WASTE CONTAINER', 'WASTE VOLUME', 'WASTE WEIGHT'. The label on the right is a diamond-shaped 'FLAMMABLE LIQUID' label with a flame icon and the number '3'.

Description: 55-gallon drum marked as hazardous waste (petroleum distillates)



# ATTACHMENT B

Arandell and Schmidt Checklist

WID 006 087 225



Revision: 03/19/2012  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## LARGE QUANTITY GENERATOR INSPECTION

This inspection form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

### Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.

*CND*  
**N**

662.011

Photo ☐

B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.

**Y**

662.011(3)

Photo ☐

C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.

**NI**

662.011(3)(a)1

Photo ☐

D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.

**NI**

662.040(3)

Photo ☐

E. Generator submitted a notification form and obtained an EPA ID#.

**Y**

662.012

Photo ☐

Note: A subsequent notification should be submitted when there is an ownership or name change.

### Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.

**Y**

662.020(1)

Photo ☐

B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.

**Y**

662.020(1)

Photo ☐

C. The facility designated on the manifest is permitted or licensed to accept the waste.

**Y**

662.020(2)

Photo ☐

D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.

**NI**

662.023(3)

Photo ☐

E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.

**NI**

662.020(1)

Photo ☐

F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.

**NI**

662.034(13)

Photo ☐

G. Upon receipt of the rejected shipment, the generator signed EITHER of the following:  
1. Manifest Item 18c if the transporter returned the shipment using the original manifest.  
2. Manifest Item 20 if the transporter returned the shipment using a new manifest.

**NI**

662.034(13)

Photo ☐

H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.

**Y**

662.040(1)

Photo ☐

I. Copy of each manifest is kept for at least three years from the date of shipment.

**N**

662.040(1)

Photo ☐

*3 manifests were not available at time of inspection*  
J. Hazardous waste is packaged according to applicable DOT requirements before transport.

**Y**

662.030

Photo ☐



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	<input checked="" type="checkbox"/>	662.031 Photo <input type="checkbox"/>
L. Hazardous waste is marked according to applicable DOT requirements before transport.	<input checked="" type="checkbox"/>	662.032(1) Photo <input type="checkbox"/>
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	<input checked="" type="checkbox"/>	662.032(2) Photo <input type="checkbox"/>
N. Placards are offered to the initial transporter.	<input checked="" type="checkbox"/>	662.033 Photo <input type="checkbox"/>

### Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	<input checked="" type="checkbox"/>	668.07(1) Photo <input type="checkbox"/>
B. Generator complies with the prohibition against dilution of wastes.	<input checked="" type="checkbox"/>	668.03 Photo <input type="checkbox"/>
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	<input checked="" type="checkbox"/>	668.07(1) Photo <input type="checkbox"/>
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	<input checked="" type="checkbox"/>	668.07(1) Photo <input type="checkbox"/>
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	<input checked="" type="checkbox"/>	668.07(1) Photo <input type="checkbox"/>
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	<input checked="" type="checkbox"/>	668.07(1) Photo <input type="checkbox"/>
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	<input checked="" type="checkbox"/>	668.07(1)(h) Photo <input type="checkbox"/>
H. Underlying hazardous constituents have been identified for characteristic wastes.	<input checked="" type="checkbox"/>	668.09(1) Photo <input type="checkbox"/>
I. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	<input checked="" type="checkbox"/>	668.09(2) Photo <input type="checkbox"/>
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	<input checked="" type="checkbox"/>	662.034(1)(d) Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply

No 'box' is an open ended question



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	<input checked="" type="checkbox"/>	662.041	Photo <input type="checkbox"/>
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	<input checked="" type="checkbox"/>	662.042(1)	Photo <input type="checkbox"/>
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	<input checked="" type="checkbox"/>	662.042(2)	Photo <input type="checkbox"/>
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	<input checked="" type="checkbox"/>	662.040(2)	Photo <input type="checkbox"/>

### Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	<input checked="" type="checkbox"/>	662.034(1)(d)	Photo <input type="checkbox"/>
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	<input checked="" type="checkbox"/>	662.034(1)(d)	Photo <input type="checkbox"/>
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	<input checked="" type="checkbox"/>	662.034(1)(d)	Photo <input type="checkbox"/>
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	<input checked="" type="checkbox"/>	662.034(1)(d)	Photo <input type="checkbox"/>
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	<input checked="" type="checkbox"/>	662.034(1)(d)	Photo <input type="checkbox"/>

### Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	<input checked="" type="checkbox"/>	662.034(1)(d)	Photo <input type="checkbox"/>
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## LARGE QUANTITY GENERATOR INSPECTION

### Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).

Y 662.034(1)(d)  
Photo ☐

C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0052(3)).

N 662.034(1)(d)  
Photo ☐

D. Contingency plan was amended due to ANY of the following (NR 665.0054):

1. Contingency plan failed in an emergency.
2. Change in site design, construction, O&M, or other circumstances which affect emergency response.
3. Emergency coordinators changed.
4. Emergency equipment changed.

Y 662.034(1)(d)  
Photo ☐

E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055):

1. Available or on call to coordinate emergency response measures.
2. Familiar with all aspects of site activities and the contingency plan.
3. Has authority to commit the resources needed to carry out the contingency plan.

Y 662.034(1)(d)  
Photo ☐

F. Contingency plan includes ALL of the following (NR 665.0052):

1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility.
2. Name, address and phone number, office and home, for each emergency coordinator.
3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services.
4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes.
5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge.
6. List of emergency equipment at the site, including location, description and capabilities of each item.

Y 662.034(1)(d)  
Photo ☐

G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056):

1. Activate internal alarms or communication systems.
2. Notify appropriate authorities, if their help is needed.
3. Identify the character, source, amount, and extent of discharged hazardous materials.
4. Assess hazards to human health and the environment.
5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003).
6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread.
7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation.
8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material.
9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed.
10. Ensure that emergency equipment is clean and fit for use prior to resuming operations.
11. Notify the department and appropriate state and local authorities before resuming operations.
12. Submit an incident report to the department within 15 days.

Y 662.034(1)(d)  
Photo ☐



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d) Photo <input type="checkbox"/>
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	N	662.034(1)(d) Photo <input type="checkbox"/>
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d) Photo <input type="checkbox"/>
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	NI	662.034(1)(d) Photo <input type="checkbox"/>
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	N	662.034(1)(d) Photo <input type="checkbox"/>
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	N	662.034(1)(d) Photo <input type="checkbox"/>
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	N	662.034(1)(d) Photo <input type="checkbox"/>

### Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	Photo <input type="checkbox"/>
B. Accumulation start date is clearly marked and visible for inspection on each container.	Y	662.034(1)(b) Photo <input type="checkbox"/>
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c) Photo <input type="checkbox"/>



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).

N

662.034(1)(a)1

Photo ☐

E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).

Y

662.034(1)(a)1

Photo ☐

F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).

Y

662.034(1)(a)1

Photo ☐

G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).

Y

662.034(1)(a)1

Photo ☐

H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).

N

662.034(1)(a)1

Photo ☐

I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).

Y

662.034(1)(a)1

Photo ☐

J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).

NA

662.034(1)(a)1

Photo ☐

K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).

NI

662.034(1)(a)1

Photo ☐

L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).

NI

662.034(1)(a)1

Photo ☐

### Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration  $\geq 10\%$  by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2)).

NI

Photo ☐

1. Pumps in light liquid service.
2. Compressors.
3. Pressure relief devices in gas or vapor service.
4. Sampling connection systems.
5. Open-ended valves or lines.
6. Valves in gas or vapor service or in light liquid service.
7. Pumps or valves in heavy liquid service.
8. Pressure relief devices in light liquid or heavy liquid service.
9. Flanges or other connectors.

B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).

NI

662.034(1)(a)

Photo ☐

C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates  $< 300$  hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).

NI

662.034(1)(a)

Photo ☐

D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).

NI

662.034(1)(a)

Photo ☐

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected  
Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply No 'box' is an open ended question



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)):

1. Analysis determining the design capacity of the hazardous waste management unit.
2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids.
3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.

NI

662.034(1)(a)

Photo ☐

F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)):

NI

662.034(1)(a)

Photo ☐

1. Information that the production process does not use organic compounds.
2. The process is identical to a process at another facility where the total organic content was measured at <10%.
3. The process has not changed to affect the total organic concentration of the waste.

G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).

NI

662.034(1)(a)

Photo ☐

H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.

NI

Photo ☐

### Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1).

Y

Photo ☐

1. Between 26 and 119 gallons.
2. Greater than 119 gallons and not in light material service.

B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)):

Y

Photo ☐

1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container.
  2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container.
  3. The initial determination is reviewed and updated at least once every 12 months.
  4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to  $\geq 500$  ppmw.
  5. The average VO concentration is determined by direct measurement or by knowledge.
- Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.

C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).

Y

662.034(1)(a)1

Photo ☐

D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)).

N

Photo ☐

Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.

E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)):

X

Photo ☐

1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities.
2. Radioactive mixed wastes in accordance with NRC requirements



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### Section 10: Subchapter CC Level 1 Container Standards

F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)):

1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements.
2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers

G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.

H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)):

1. Container meets applicable US DOT packaging requirements.
2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container.
3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere.

Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.

I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).

J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).

K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b):

1. No additional material will be added within 15 minutes.
2. The person performing the loading operation leaves the immediate vicinity of the container.
3. The process generating the waste shuts down.

L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b):

1. No additional materials will be removed within 15 minutes.
2. The person removing the waste leaves the immediate vicinity of the container.

M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).

N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4):

1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position.
2. The device is closed when the internal pressure is within the specified operating range.
3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.

O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).

P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).



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### Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).

662.034(1)(a)1

Photo ☐

### Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.

Photo ☐

B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a))

662.034(1)(a)2

1. Container meets applicable US DOT packaging requirements.
2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring.
3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.

Photo ☐

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a))

662.034(1)(a)2

1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve.
2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.

Photo ☐

D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))

662.034(1)(a)2

Photo ☐

E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))

662.034(1)(a)2

Photo ☐

F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)

662.034(1)(a)2

Photo ☐

G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.)

662.034(1)(a)2

Photo ☐

1. No additional material will be added within 15 minutes.
2. The person performing the loading operation leaves the immediate vicinity of the container.
3. The process generating the waste shuts down.

H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.)

662.034(1)(a)2

Photo ☐

1. No additional materials will be removed within 15 minutes.
2. The person removing the waste leaves the immediate vicinity of the container.

I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)

662.034(1)(a)2

Photo ☐



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### Section 11: Subchapter CC Level 2 Container Standards

J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.)

1. Designed to operate with no detectable organic emissions when in the closed position.
2. Closed when the internal pressure is within the specified operating range.
3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.

662.034(1)(a)2

Photo ☐

K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)

662.034(1)(a)2

Photo ☐

L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)

662.034(1)(a)2

Photo ☐

M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)

662.034(1)(a)2

Photo ☐

### Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.

Photo ☐

B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))

662.034(1)(a)2

Photo ☐

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)

662.034(1)(a)2

Photo ☐

D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))

662.034(1)(a)2

Photo ☐

E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))

662.034(1)(a)2

Photo ☐

### Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.

X

Photo ☐

B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.

N

662.034(3)(a)

Photo ☐

C. Satellite containers are under the control of the operator of the process generating the waste.

X

662.034(3)(a)

Photo ☐

D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).

Y

662.034(3)(a)1

Photo ☐

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply No 'box' is an open ended question

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### Section 13: Satellite Accumulation

E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	Y	662.034(3)(a)1 Photo <input type="checkbox"/>
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(3)(a)1 Photo <input type="checkbox"/>
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	N	662.034(3)(a)2 Photo <input type="checkbox"/>
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N	662.034(3)(b) Photo <input type="checkbox"/>
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	N	662.034(3)(b) Photo <input type="checkbox"/>

EXCLUDED SOLVENT CONTAMINATED WIPES

### Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e) Photo <input type="checkbox"/>
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree.	Y	662.027(1) Photo <input type="checkbox"/>

Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.

### Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	Y	 Photo <input type="checkbox"/>
B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	N	679.10(2)(a)2 Photo <input type="checkbox"/>
C. Used oil containers and tanks are in good condition and not leaking.	Y	679.22(2) Photo <input type="checkbox"/>
D. Used oil containers and tanks are marked "used oil".	N	679.22(3)(a) Photo <input type="checkbox"/>
E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.	Y	679.24 Photo <input type="checkbox"/>
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	NA	 Photo <input type="checkbox"/>



## LARGE QUANTITY GENERATOR INSPECTION

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### Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met:

1. Only used oil from the generator or household do-it-yourselfers is burned.
2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less.
3. The combustion gases are vented to the ambient air.

N

679.23

Photo ☐

H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.

NA

679.11

Photo ☐

### Section 16: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.

N

Photo ☐

B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.

662.034(7)

Photo ☐

C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.

662.034(7)(a)

Photo ☐

D. The F006 waste is legitimately recycled through metals recovery.

662.034(7)(b)

Photo ☐

E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.

662.034(7)(c)

Photo ☐

F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.

662.034(7)(d)1.a

Photo ☐

G. The accumulation start date is clearly marked and visible for inspection on each container.

662.034(7)(d)3

Photo ☐

H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.

662.034(7)(d)1.b

Photo ☐

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".

662.034(7)(d)4

Photo ☐

J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.

662.034(7)(d)1.c

Photo ☐

K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.

662.034(7)(d)5

Photo ☐

L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.

662.034(8)

Photo ☐



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.

X

662.034(1)

Photo ☐

B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).

X

Photo ☐

C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).

Photo ☐

D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR.665.0197(1), NR 665.0197(2)):

NA

662.034(1)(a)2

Photo ☐

1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment.

2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.





# ATTACHMENT C

Arandell and Schmidt Supporting Documentation

WID 006 087 225

Arandell and Schmidt Supporting Documentation WID 006 087 225

Date Provided: August 13, 2014

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**Arandell and Schmidt (Post Inspection Supporting Documentation)**[illegible]